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5 Attorney for Defendant
IMAGEM PRODUCTION MUSIC LLC
6 d/b/a 5 ALARM MUSIC and d/b/a
CYPRESS CREEK MUSIC
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

12 RICHARD FRIEDMAN, an individual,
13 Plaintiff,

14 vs.

15 HANS ZIMMER, individually, and doing
business as REMOTE CONTROL
16 SONGS; TWENTIETH CENTURY FOX
FILM CORPORATION; FOX
17 SEARCHLIGHT PICTURES INC.; FOX
ENTERTAINMENT GROUP, INC.;
18 NEW REGENCY PRODUCTIONS,
INC.; RIVER ROAD
19 ENTERTAINMENT LLC; PLAN B
ENTERTAINMENT, INC.; REMOTE
20 CONTROL PRODUCTIONS, INC.,
SONY MUSIC ENTERTAINMENT;
21 IMAGEM PRODUCTION MUSIC LLC,
individually, and doing business as 5
22 ALARM MUSIC and also doing
business as CYPRESS CREEK MUSIC;
23 DOES ONE through TEN, inclusive,

24 Defendants.
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Case No. **2:15-CV-00502 GHK-E**

**STIPULATION EXTENDING TIME
FOR DEFENDANT IMAGEM TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

[[Proposed] Order Granting Stipulation
Extending Time For Defendant Imagem
To Respond To Plaintiff's First Amended
Complaint Concurrently Filed]

Action Filed: January 22, 2015

1 This Stipulation is entered by and between Plaintiff Richard Friedman
2 (“Plaintiff”), on the one hand, and Defendant Imagem Production Music LLC d/b/a
3 5 Alarm Music and d/b/a Cypress Creek Music (“Imagem”), on the other hand, with
4 reference to the following facts:

5 WHEREAS, Plaintiff filed a First Amended Complaint (“FAC”) on March 23,
6 2015, and served the FAC by mail on Imagem on April 14, 2015;

7 WHEREAS, pursuant to the Federal Rules of Civil Procedure, Imagem
8 presently has until May 1, 2015, to respond to Plaintiff’s FAC;

9 WHEREAS, Imagem has been diligently evaluating the FAC and how to
10 respond thereto;

11 WHEREAS, Plaintiff has agreed to extend the deadline for Imagem to answer
12 or otherwise respond to the FAC by thirty additional days, such that the new deadline
13 will be June 1, 2015;

14 WHEREAS, no prior extensions have been requested;

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
16 between the undersigned attorneys for the respective parties, and subject to the
17 approval of the Court, that Imagem has until and including June 1, 2015, to answer or
18 otherwise respond to Plaintiff’s FAC.

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20 DATED: April 30, 2015

BLECHER COLLINS PEPPERMAN & JOYE, P.C.
MAXWELL M. BLECHER
DONALD R. PEPPERMAN
JOHN E. ANDREWS

23 LAW OFFICES OF JEFFREY L. GRAUBART, P.C.
JEFFREY L. GRAUBART

25 By: /s/ Jeffrey L. Graubart

26 Jeffrey L. Graubart
Attorneys for Plaintiff Richard Friedman
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DATED: April 30, 2015

DAVIS WRIGHT TREMAINE LLP
DIANA PALACIOS

By: /s/ Diana Palacios
Diana Palacios
Attorney for Defendant
IMAGEM PRODUCTION MUSIC LLC